



RAJASTHAN JOINT VENTURE

GUJARAT - FRAMEWORK

PUBLIC CONSULTATION AND DISCLOSURE PLAN

MARCH 2008

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1. INTRODUCTION

Cairn India Limited (Cairn India) is an upstream oil and gas exploration and production company, incorporated in August 2006 and listed on the Bombay Stock Exchange Limited and the National Stock Exchange of India. Prior to the incorporation and listing of Cairn India, Cairn Energy PLC (Cairn Energy), a UK listed company, held interests and operated in India through a number of wholly owned foreign subsidiaries. Subsequent to the listing of Cairn India, Cairn Energy remains the majority shareholder, with 69 per cent shareholding as at the date of this document with the balance held by a variety of domestic and foreign investors.

Prior to listing, Cairn India acquired from Cairn Energy the wholly owned foreign subsidiaries and now holds its interests and operates in India through these same subsidiaries. Cairn India Limited and the wholly owned foreign subsidiaries are referred to as the Cairn India Group or the Group.

The Cairn India Group's existing production is concentrated in two areas, the Ravva Field in Andhra Pradesh and Lakshmi and Gauri Fields in Gujarat (both producing oil and gas). The Cairn India Group is active in exploration in a number of other areas in India.

Cairn Energy India Pty Limited (CEIL) is an important subsidiary of Cairn India as it is not only a party to RJ-ON-90/1 Block Production Sharing Contract (PSC) dated 15th May, 1995 but also its Operator. Over the last few years, CEIL has conducted an intensive exploration and appraisal programme in this Block which has yielded significant discoveries in Rajasthan (situated in north-western part of India). Oil and Natural Gas Corporation Limited (ONGC), a Central Government Company, the Licensee of this Block, has also been given a 30% interest in Mangala, Aishwariya, Raageshwari, Saraswati, Bhagyam and Shakti fields of the Block, as required by the Government of India under the provisions of the PSC.

The Govt. of India accorded 'in principle approval' to Cairn India and ONGC ("Rajasthan JV") in August 2007, to acquire 'Right of User' (ROU) for laying crude oil transportation pipeline from Barmer to Salaya. Consequently, Rajasthan JV is implementing the Barmer-Salaya Pipeline (BSPL) project - approximately 600 km of buried insulated pipeline from Barmer, Rajasthan to Salaya, Jamnagar district, Gujarat.

The implementation of the above hydrocarbon development and crude evacuation projects require certain lands to be acquired on a temporary basis for exploratory work (seismic surveys, exploratory drilling, appraisal, approach roads etc), and certain others on permanent acquisition basis for establishing the facilities (well-pads, well-sites, process facilities etc), and acquisition of Right of User (ROU) for laying the pipelines.

Cairn India Group Public Consultation and Disclosure Plan (PCDP) outlines the Group's initiatives to inform and consult those people affected by the Group's projects in India in compliance with the Group's policies, local regulatory requirements and the IFC Policies and Performance Standards on Social and Environmental Sustainability (in particular the section on community engagement contained in Performance Standard 1 - Social and Environmental Assessment and Management System).

This document describes the Rajasthan JV - Gujarat Framework Public Consultation and Disclosure Plan (Gujarat PCDP) governing the JVs ongoing stakeholder engagement as well as proposed consultation and disclosure programme to be undertaken through the project life cycle, for its activities and operations in Gujarat. The document describes the Rajasthan JV initiatives to inform and consult with those peoples affected by the Rajasthan JV activities and operations in compliance with the Cairn India Group Public Consultation and Disclosure Plan, Cairn India Group policies, regulatory requirements

and the IFC Policies and Performance Standards on Social and Environmental Sustainability (in particular the section on community engagement contained in Performance Standard 1 - Social and Environmental Assessment and Management System).

Public consultation plays an important role in the review and approval process by the regulatory authorities for projects in India. The environmental clearance process for certain categories of projects, including hydrocarbon exploration, production and storage requires public hearings to be held and the Project Proponents to respond to issues of concern raised by the concerned stakeholders. The land acquisition process under the Land Acquisition Act also requires public notifications and communication to the project affected families.

The Gujarat PCDP is intended to be a framework document that articulates the principles and guidelines on the manner in which public consultation will be carried out during the life cycle of the Rajasthan JV projects in Gujarat. In case found necessary, specific issues will be elaborated further as part of the specific Project Information Summary (PSI) for key developments.

1.1 KEY PRINCIPLES FOR PUBLIC CONSULTATION AND DISCLOSURE

As already mentioned, public consultation and disclosure plays an important role in the review and approval process by the authorities for projects in India. Public consultation and disclosure needs to be carried out in conformity with the following key principles, taking into account the cultural specificities of the impact area:

- All affected stakeholders to be consulted and involved in a two-way communication with the Project Proponents
- The consultation to be preceded by provision of relevant information available at such time, in a form which is easily understood by the relevant stakeholder
- Consultations to be a regular and an on-going process to allow the participants to know whether and how their concerns are being addressed by the Project Proponents
- Supply of information and consultation with different stakeholders to be through a language and medium that the stakeholders are comfortable with
- There will be a specific and transparent mechanism for recording of grievances and a feedback mechanism to inform the action taken by the Project Proponents
- There will be clear enunciation of responsibility and accountability procedures, personnel and resource availability for effective implementation of the Public Consultation and Disclosure Plan

1.2 SCOPE OF THE RAJASTHAN JV - GUJARAT FRAMEWORK PUBLIC CONSULTATION AND DISCLOSURE PLAN (PCDP)

The Rajasthan JV - Gujarat Framework PCDP will:

- Provide a brief outline of the project related activities being carried out in the project-area covered by the Barmer - Salaya pipeline in Gujarat and the nature of land acquisition needs as well as summarize the legal framework, policies, principles and review the stakeholder engagement process and procedures followed
- Set out the public consultation and disclosure plan and grievance redressal mechanisms
- Describe implementation responsibilities, and a process for monitoring and evaluation

2 PROJECT OVERVIEW AND STAKEHOLDER CONSULTATION AND DISCLOSURE PROCESS

The Rajasthan JV 600 km long pipeline project starts at the Mangala Processing Terminal in Barmer, Rajasthan and enters the state of Gujarat from Jalore district of Rajasthan. Around 450 km of the said pipeline traverses through Gujarat and passes through the north-western districts namely Banaskantha, Patan, Ahmedabad and Surendranagar and those in Saurashtra (also referred to as Kathiawar) namely Jamnagar and Rajkot. The 30 m wide pipeline corridor will be acquired on ROU basis in accordance to the rules / procedure of the Petroleum and Minerals Pipelines Act, (PMP) 1962.

2.1 RAJASTHAN RJ-ON-90/1 BLOCK AND BARMER-SALAYA PIPELINE PROJECT ACTIVITIES SUMMARY

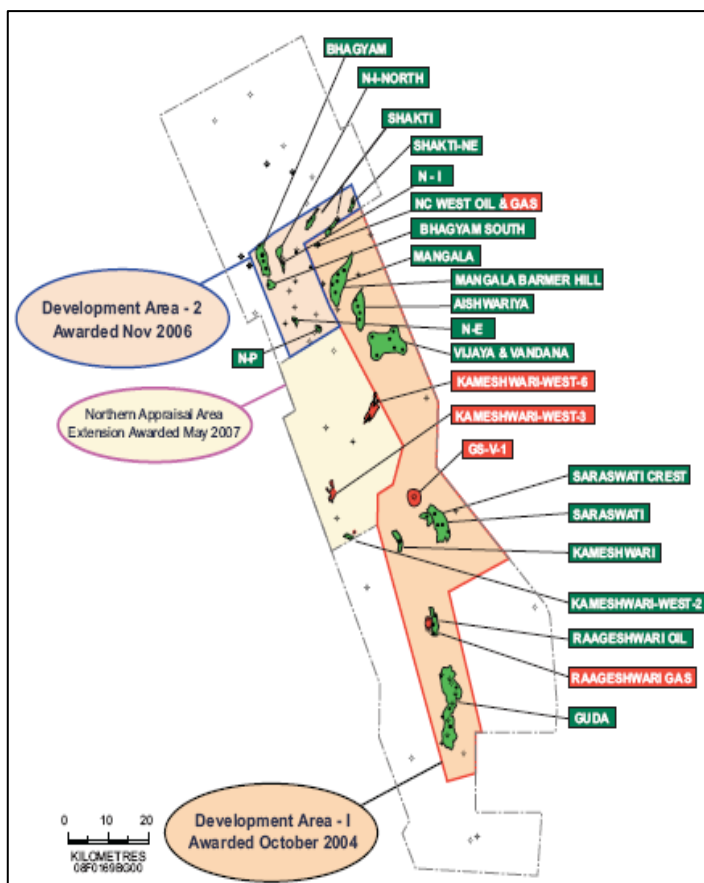
The RJ-ON-90/1 Block straddles the Barmer and a small portion of the Jalore districts in south -west Rajasthan. It is spread across six tehsils namely Barmer, Baytoo, Shiv and Gudhamalani tehsil in Barmer district and Sanchoe and Bhinmal tehsil in Jalore district. Cairn Energy India Pty Limited (CEIL) is the operator of the Rajasthan Block on behalf of the Rajasthan JV. The hydrocarbon development area of the block presently consists of:

- The Mangala, Aishwariya, Raageshwari and Saraswati (MARS) development area (1,859 km²), awarded to the Rajasthan JV in October 2004 and which includes the Mangala, Aishwariya, Saraswati and Raageshwari fields (the “Development Area-1”) until 2020; and
- The Bhagyam and Shakti (B&S) development area (430 km²), awarded to the Rajasthan JV in November 2006 and which includes the Bhagyam and Shakti fields (the “Development Area-2”)
- Application filed by the Rajasthan JV to the Government of India seeking a further development area in Kaameshwari - West (1178 km²) carved out of the earlier appraisal area. The application is under consideration with the Government

Over the last few years, the Rajasthan JV has conducted an intensive hydrocarbon exploration and appraisal programme in Rajasthan, which has yielded significant discoveries including several world-class finds. More than 140 wells have been drilled to date in Rajasthan and have made over twenty hydrocarbon discoveries in the block, with significant oil discoveries such as the Mangala, Bhagyam, and Aishwariya.

There are also smaller discoveries in the Southern Zone of the block, known as Saraswati and Raageshwari. The map of RJ-ON-90/1 block showing all the discovered fields is given in **Figure 2.1**.

The Barmer Basin has been informally subdivided into the Northern Fields and Southern Fields at an approximate line of latitude immediately north of the Saraswati field. The Northern Fields are generally relatively simple large scale tilted fault blocks, with a series of stacked fluvial sandstones of the Fatehgarh Group as the principal reservoir rocks. The Southern Fields consist of two principal plays: a shallow crude oil accumulation in fields such as Saraswati, Guda and Raageshwari oil, and a deeper gas accumulation beneath these fields, such as in the Raageshwari Deep gas field.



Final Government approval has been obtained for the MARS Field Development Plan (FDP) and B&S Field Development Plan application has been submitted to the Government of India and is under consideration. The Declaration of Commerciality (DoC) document for the Kaameshwari West development area has been submitted to the GoI and is under consideration for approval. Regulatory approvals are also in place for the MARS field development.

Figure 2.1: Discovered fields in RJ-ON-90/1 block

The land acquisition for the Mangala field development has been completed and the contract for the construction and erection

of the Mangala terminals has been awarded. The present schedule is to have the flow of the 'First Oil' from Mangala by H2 2009.

2.1.1 BARMER SALAYA PIPELINE

In August 2007, on a specific application from the Rajasthan JV, the Ministry of Petroleum and Natural Gas (MoPNG), Government of India agreed in principle for the grant of ROU to the Rajasthan JV (Cairn India and ONGC) to lay a pipeline from RJ-ON-90/1 Contract Area in Barmer, Rajasthan to Salaya, Gujarat for evacuation of crude oil, in compliance to the rules / procedures under the Petroleum and Minerals Pipeline (PMP) Act, 1962 for formal acquisition of ROU. It further stipulated that as per the provisions of the PMP Act, Competent Authority (CA) is to be notified by the Central Government for the acquisition of the ROU.

Rajasthan JV performed various conceptual / technical studies in 2006, considering the nature of the crude from the Rajasthan oil fields to be waxy crude oil with a pour point of approximately 40°C, i.e. the crude will solidify at ambient ground conditions. The concept selected, in early 2007, after consideration of a wide range of possible alternatives was to construct a "heated" pipeline which can continuously maintain the temperature of the oil above the Wax Appearance Temperature ("WAT") of 50-65°C and re-heat the oil to greater than the Wax Dissolution Temperature ("WDT") of 70-75°C. The design flow rate is 150,000 bopd with a 30,000 bopd minimum turndown, but will have the potential for a maximum throughput of 180,000 bopd.

2.2 REGULATORY FRAMEWORK FOR CONSULTATION AND DISCLOSURE IN INDIA

Project-level public consultation and disclosure are guided by the following laws and policies:

2.2.1 LAND ACQUISITION ACT, 1894

A Central Legislation called 'Land Acquisition Act, 1894' governs land acquisition in India. It is a very comprehensive legislation and addresses all the facets of the land acquisition process in detail. While it recognises the State's right to acquire lands for 'public purpose', it also recognises the interests and concerns of the all interested persons and provides for a fair and equitable method to compensate them.

At every stage of the land acquisition process there is adequate flow of communication by virtue of publication of various notifications, declarations, notices in the Government Gazette, local press, local areas etc. This ensures provision of timely and reasonable opportunity to all the interested persons to claim rights and compensation.

The Land Acquisition Act, 1894 initially stated that a notification for land acquisition would have to be issued under Section 4(1) indicating the intention of the Government to acquire land or other property in the official gazette. However, the 1984 amendment requires the Section 4 (1) notification to be also published in two local newspapers, of which at least one should be in a regional language / local vernacular. In addition to the public notice, the substance of such notification made by the Collector has to be made available at convenient places in the locality where the said land is situated.

Compensation for the land acquired will be decided by the appointed authority for this purpose and has to be paid on the basis of market value as on the date of notification under Section 4 (1). Further, in addition to the market value of land as stated above, the Land Acquisition Act requires payment of an extra sum equivalent to 30 per cent of the market value of the land as '*solatium*'.

This notification gives the affected / interested parties an opportunity to file objections before the District Collector. In case any objection is filed, the Collector has to arrange for a hearing and thereafter submit a report to the concerned State Government department. If the Government, after reviewing the objections and responding to it, wishes to go ahead with the Land Acquisition, it has to make a declaration under section 6 of the Land Acquisition Act. The declaration under section 6 has to be published in a similar manner as Section 4(1).

2.2.2 THE PETROLEUM AND MINERALS PIPELINES ACT (ACQUISITION OF RIGHT OF USER IN LAND), 1962

The proposed Barmer - Salaya pipeline would require the acquisition of 'Right of User' for laying pipelines across private and public lands or any other utilities under the provisions of the Petroleum and Minerals Pipelines Act, 1962. The Act specifies all the formalities that a project proponent has to adhere to with respect to publication of notification of acquisition, power to enter and survey the proposed land, hearing of any objections, declaration of acquisition of right of user, restrictions regarding land use and compensation.

The key tenets of the Petroleum and Minerals Pipelines Act, 1962 of concern for purposes of public consultation and disclosure are as follows:

- Establishment of a Competent Authority to preside over matters of land, ROU, compensation, hearing objections and dispute settlement
- Prior notification declaring the intention of acquiring right of user must be obtained from the Competent Authority before entering, surveying or inspecting land/ROU

2.2.3 ENVIRONMENT (PROTECTION) ACT 1984, AMMENDMENT 1997

Oil and gas projects, require prior clearance from the Ministry of Environment and Forests (MoEF), Government of India. Projects requiring environmental clearance are subjected to environmental public hearing as part of the Environmental Impact Assessment (EIA) process. As per the EIA notification, the environmental public hearing process is mandatory before the project can be considered for grant of environmental clearance. The District Collector / notified authority is responsible to conduct the Public Hearing. The State Pollution Control Board issues a notice for environmental public hearing which needs to be published in at least two newspapers widely circulated in the region around the project, one of which should be in the vernacular language of the locality concerned with details like date, time and place of public hearing.

The project developers applying for environmental clearance for projects are required to provide to the concerned State Pollution Control Board / District Collector's / notified authority's office copies of the executive summary containing the salient features of the project, environmental and social impacts due to the project activities and the mitigation measures to minimise the impact through the implementation of appropriate environmental management programs. The executive summary is to be provided both in English as well as local language. A 30 day notice period is to be given and the concerned persons are to be provided access to the Executive Summary of the Project at notified public places.

Suggestions, views, comments, and objections of the public should be invited within thirty days from the date of publication of the notification. All persons including bona fide residents, environmental groups and others located at the projects site/sites of displacement/and sites likely to be affected can participate in the public hearing and can also make verbal /written suggestions to the State Pollution Control Board.

The proceedings of the Public Hearing are recorded by the Regional Officer, and video of the entire proceedings is provided as evidence that the public consultation process had taken place and the relevant views of the public have been recorded in the proceedings of the Public Hearing. The minutes of the Public Hearing are approved by the State Pollution Control Board official and the District Collector, or his nominee who officiates on the meeting. The minutes are also put up in the State Pollution Control Board website and available to the public on request at the State Pollution Control Board office.

2.2.4 INTERNATIONAL GOOD PRACTICES

International good practice such as the IFC Performance Standards (in particular the section on community engagement contained in Performance Standard 1 - Social and Environmental Assessment and Management System) requires the Project Proponents to provide project affected groups, local NGOs, community representatives and other stakeholders relevant material and information in a timely manner, prior to consultation and in a language that is understandable, for meaningful consultation. The information provided is in a summary form describing the project's objectives, components and potential impacts after the preparation of Environmental Impact Assessment (EIA) report. This information needs to be made available at a public place accessible to these stakeholders.

2.3 STAKEHOLDER ENGAGEMENT IN BARMER-SALAYA PIPELINE (BSPL) PROJECT

2.3.1 STAKEHOLDERS

Identification of stakeholders and their inclusion in the decision making process is an integral aspect of project viability and success. Continuous stakeholder engagement is an ongoing process throughout the project life cycle.

Stakeholders for the Rajasthan JV project can be categorised as

- internal stakeholders - comprising the project owners including JV partner and various functional groups of CEIL
- external stakeholders - comprising shareholders, local communities, regulatory authorities, and financial and other institutions / organisations / individuals which have direct or indirect as well as high to low interest in the project.

2.3.1.1 Internal Stakeholders

Internal stakeholders have direct stakes in the project and are the project owners. They have both high influence and high interest in the project. These include the following entities and their representatives:

- Cairn India including its subsidiary Cairn Energy India Pty Limited
- JV Partner (ONGC)

2.3.1.2 External Stakeholders

The external stakeholders identified in the project include:

Financial Stakeholders

- Cairn India Shareholders
- International Finance Corporation (IFC)
- Financial Institutions (Funding Organisations)

Local community

- Panchayats
- Local residents/villagers
- Vulnerable groups (including project-affected families, women , marginal communities)

District and local administrative bodies

- District Collector/Magistrate
- Land Acquisition Officer
- Sub-Divisional Magistrate (SDM)
- DRDA/ Zila Parishad/Block Development Offices
- Health Department
- District Hospital
- Nagar Palika Municipal Board
- Public Health Engineering Department (PHED)
- Defence establishments, if any
- Gujarat State Electricity Board
- Posts and Telephone Department

Regulatory authorities

- Securities Exchange Board of India (SEBI)
- Ministry of Environment and Forest (MoEF), New Delhi

- Ministry of Petroleum and Natural Gas (MoPNG)
- Ministry of Defence (MOD)
- Gujarat State Pollution Control Board (RSPCB)
- Gujarat State Forest Department
- Directorate of Petroleum, Govt. of Gujarat
- Ground Water Department, Govt. of Gujarat
- Central Ground Water Authority (CGWA)
- Central Ground Water Board (CGWB)
- Indian Railways
- Public Works Department (PWD), Govt. of Gujarat
- National Highways Authority of India (NHAI)
- Competent Authority nominated and notified under the Petroleum and Minerals Pipelines Act, 1962 for Right of User Acquisition

Private Sector Services

- Private Hospitals
- Private Hotels/ Guest-house owners
- Construction and Transport contractors
- Local suppliers and service providers

Others

- Other Industries / Micro, Small and Medium Enterprises
- NGOs
- Media
- Local political leaders
- Contractors, vendors / sub-contractors associated directly or indirectly with the activities and operations of the Rajasthan JV
- State and Central Governments

2.3.2 STAKEHOLDER ENGAGEMENT IN BSPL PROJECT AREA

The Rajasthan JV has held direct consultations with the affected community members, especially the land-owners affected by the ROU and the representatives from the respective village Panchayats. Regular interactions are held between the Rajasthan JV officials and individual land owners and concerned village and revenue officials during the ROU and permanent land acquisition process through direct negotiations on a *“willing-buyer and willing-seller”* basis. These consultations are held both on an individual and organised collective basis and most times accompanied by representatives from the Competent Authority.

The Rajasthan JV has developed close working relationships and regular communication channels with the District Administration, a key stakeholder. Additionally, consultation with the village level committees, project-affected families and other interest groups are also in place. These forums serve the objective to inform on the economic opportunities available, project relevant information, grievance redressal, and consultation on the community development initiatives and programmes that are planned. It also serves as a forum to hear and resolve issues and concerns of both the community and the JV.

As a part of its external communication commitment, the Rajasthan JV actively engages with the local, state-level and national media to communicate information about the project to a wider stakeholder group. This process was further strengthened with the

launch of Initial Public Offer (IPO) of Cairn India in 2006, wherein extensive media interaction and consultation took place and will be maintained as an on-going process.

In continuation of established best practice, the company commissioned a Social Baseline and Impact Assessment Study for the proposed Barmer - Salaya Pipeline passing through Rajasthan and Gujarat. The study summarised the socio-economic baseline and identified potential impacts of the project area covered by the proposed pipeline. Tools like community consultations, meetings with community leaders and panchayat members, Focused-Group Discussions with village opinion makers, locals NGOs and one-on-one interviews with local communities were used to gather information and also to seek community response to the expected impacts and outcomes from the project.

In addition to demographic profiling, the baseline survey entailed detailed discussions with the community on issues related to agriculture, animal husbandry, fodder, fuel-wood, health, water and education. Separate tools were used for discussions with women and marginalised communities to understand their specific issues and perceptions. The consultations also sought people's opinions on the modalities adopted for land acquisition, their expectations and concerns. The baseline study further consulted Block Development Officers, Education officers, and local NGOs. The report was made public to the stakeholders of the project on request.

The Rajasthan JV has and will continue to conduct Public Hearings in relation to the project-related activities in the Block and in compliance to the regulatory requirements under the EIA notifications. During the public hearings project details, its environmental and social impacts and proposed mitigation and management measures were / will be discussed and concerns and views of the public solicited based on which, wherever relevant and appropriate, revisions incorporated to address the concerns / suggestions.

2.3.3 ONGOING / EXISTING CSR ACTIVITIES OF RAJASTHAN JV IN GUJARAT

Cairn India has been carrying out community development initiatives in the Gauri and Laxmi fields area in Gujarat (the CB-OS/2 block) in the Suvali village near Surat. The community development programmes are conceptualised and designed in consultation with the key stakeholders especially, the District Administration, community leaders, prominent local NGOs, and the Zila Parishad. Discussion with the village committees aid in identifying and prioritising the community development programmes and develop the implementation methodology, beneficiary identification and selection and key project milestones. Most of the community development programmes are executed by employing people from the local community.

Some of the major community development initiatives carried out in Suvali are mentioned below:

- Local community infrastructure development (improved drinking water facilities, computerisation of the panchayat office, roads benefiting adjoining villages, drinking water facilities for livestock)
- Education initiatives in the Suvali primary school to improve the quality of teaching and learning (improvement in school infrastructure, provision of teaching and learning material including books, bags, uniforms, science equipments; annual awards instituted in recognition of improved academic performance, and hosting of annual celebrations on occasions and special events like science exhibitions)

- Health initiatives (organising health awareness and diagnostic camps, support to Department of Health in rolling out of public health schemes, HIV/AIDS Awareness programmes in high risk areas)
- Economic development initiatives (Utilisation of local resources since plant setup in civil work, horticulture development, housekeeping and transport requirements)
- Disaster relief (regular support in annual floods that affect the area, extending of Cairn resources such as helicopters and fire tenders in emergency situations such as village fire and drowning situations)

2.3.4 SUPPORTING COMMUNITY DEVELOPMENT ACTIVITIES UNDER ROU ACQUISITION

Through appropriate consultation process with the district administration and community leadership, the Rajasthan JV will design and implement common community socio-economic development projects in the villages affected by the ROU acquisition. These programmes will aim at increasing awareness and capacity building on health and education and integrate with the existing government development projects for enhancing service delivery and efficiency. Common community infrastructures may also be developed in the ROU affected villages.

3 PUBLIC CONSULTATION AND DISCLOSURE PROGRAMME

This section provides the intent and framework of the public consultation and disclosure plan for the Rajasthan JV - Gujarat projects and operations. The Rajasthan JV - Gujarat Framework Public Consultation and Disclosure Plan is meant to be a dynamic and ongoing process, regularly amended to effectively engage in two-way stakeholder engagement and consultation. However, the broad principles and objectives will remain as outlined in the following sub-sections.

3.1 STAGES OF CONSULTATION

Consultation with the affected community in the project impact area and the key stakeholders is an ongoing process. However, there are distinct stages in the project life-cycle when key issues/points need to be discussed with the key stakeholders.

These include the following (an indicative list):

- Scoping and design phase
- Social and Environmental Assessment
- Pre-construction / land acquisition phase - temporary, permanent or Right of User
- Construction phase
- Operation phases
- Closure of the project

3.2 INFORMATION REQUIREMENT

For a public consultation and disclosure to be effective, it is important that relevant and comprehensive information is disseminated to all the stakeholders.

The following are the key information /documentation that will be disclosed to the concerned stakeholders in the project area upon request:

- A Project Information Summary containing the main elements of the project, its sponsors, project costs, location, a description of the project and a brief summary of environmental and social impacts and the proposed mitigation of measures (*The Executive Summary of the Environmental Impact Assessment Report*)
- An Environmental and Social Impact Assessment, which has been prepared for obtaining environmental clearance for the project. The EIA report details the potential environmental and social impacts of the proposed project and an environmental and social management plan which will be made available to all the stakeholders and kept at designated places for easy accessibility to the public
- A Rajasthan JV - Gujarat Framework Land Acquisition and Compensation Plan (Gujarat LACP), containing an explanation of the extent and location of any land and other assets to be acquired (temporary, permanent and Right of User); detailed information on land acquisition process, the principles used for determination of compensation amount and other entitlements
- Other relevant Action Plans such as community development plans, corrective action plans; closure plans, etc. addressing community development, rehabilitation and other measures proposed by the Project Proponents
- Information on the grievance redressal mechanism

3.3 MEDIUM OF PROVIDING INFORMATION

Given the large linear distance of the pipeline project area in Gujarat and a wide mix of communities with varying literacy levels in the project area, efforts to effectively communicate information to all project affected groups, and to other stakeholders will require careful planning. Various means of communication and information dissemination have and will be adopted to ensure that the communication is effective and reaches out to a wide array of stakeholders. The selection of the communication, consultation and information dissemination methodology depends on the spatial factors and the stakeholders to be addressed.

Some of the communication and information dissemination media for providing information to various stakeholders may include the following. All these documents will be made available to the Competent Authority notified by the Government under the Petroleum and Minerals Pipelines Act, 1962 and other applicable legislations to share with concerned key stakeholders upon request.

- Documents and reports (executive summary of Environmental and Social Impact Assessment report, Project Summary Information and the Rajasthan JV - Gujarat Framework Land Acquisition and Compensation Plan) in English and Hindi / Gujarati (any one local language). These documents are placed in the office of the District Collector / Competent Authority, tehsil head quarters and the regional office of the Gujarat State Pollution Control Board. These documents are provided to relevant government departments / interested parties on request. Newspaper notification published, as and when required, giving the details of the location where these documents can be accessed
- Information about the Land Acquisition process (temporary, permanent or Right of User acquisition) for “interested persons” to claim eligibility for compensation. This is primarily done by the Land Acquisition Officer as per the requirements laid down in the Land Acquisition Act or the Competent Authority nominated and notified by the Government for Right of User Acquisition under the provisions of the Petroleum and Minerals Pipelines Act, 1962
- Specific written information on land acquisition/ROU process provided to the project affected families, along with information on compensation assessment process. This is primarily done by the Land Acquisition Officer as per the requirements laid down in the Land Acquisition Act and / or the Competent Authority nominated and notified by the Government for Right of User Acquisition under the provisions of the Petroleum and Minerals Pipelines Act, 1962
- Public announcements with respect to the land acquisition / ROU process - date of notification, dates of receiving objections regarding the notification, grievances etc
- Discussions and meetings with the Land Acquisition Officer / Competent Authority to inform people about potential impacts about the project, compensation and rehabilitation and to understand their concerns and expectations from the project

- Discussion and meeting with the village panchayats, community representatives, prominent local NGOs and the District Administration on the project related issues including compensation and rehabilitation measures
- Discussions and meetings with project construction and operations group including concerned contractors and the local community representation, district administration
- Local /traditional methods that are popular in the area, for example puppetry and street-plays could be developed to inform people about the project components and its positive and negative impacts as well as the grievance redressal mechanism

3.4 PLACE AND METHOD OF CONSULTATION

The place and methodology for consultation is decided / will be decided, keeping in view the appropriateness of the venue for specific stakeholders, the ease and comfort in free expression of their views, and acceptability of the location. Taking these factors into consideration, the place and method of consultation for various groups of stakeholders is chosen / will be chosen in the following manner:

3.4.1 GOVERNMENT, FINANCIAL INSTITUTIONS, MEDIA, NGOS AND POLITICAL LEADERS / REPRESENTATIVES

These meetings are / will be conducted in the respective offices or the local district administration / public office / office of the Competent Authority with representation from the key project stakeholders such as the community representatives, prominent NGOs, local political leaders and government officials. Meetings with the project construction and operation group are usually held / will be held near the project location worksite.

Meetings with the village panchayat are / will be held at the common meeting place in the village. At regular intervals, the Rajasthan JV organises / will organise media briefings and NGO meetings to interact with a wider group of stakeholders to either communicate a specific message or to inform them about project progress or any other relevant issue.

3.4.2 RESIDENTS OF AFFECTED VILLAGES IN THE PROJECT IMPACT AREA

The meetings and consultations are organised / will be in the Panchayat office, or any other common assemblage area considering the availability and suitability in specific villages such as village schools, panchayat halls etc. The venue is decided by the village panchayat. Information is disseminated through group discussions, leaflets, street plays and video shows. For one-to-one interactions with the land-owners getting affected by the ROU, meetings are done / will be done at the land-owners doorsteps at a time convenient to the concerned land-owner. The land-owner is free to invite members from the Panchayat and other community leaders to the meeting at his or her household.

3.5 RECORD OF CONSULTATIONS

All records of public consultation sessions are maintained / will be maintained by the Rajasthan JV CSR Group. The records of consultations may include the following:

- Location and dates of consultations (meetings, workshops, Focused Group Discussions etc.)
- Names and profile of people consulted
- Details of the issues discussed and concerns raised
- Responses of the Rajasthan JV to issues/concerns raised
- Processes of addressing the issues including the names of responsible persons to address each of the issues/concerns and the time schedule for addressing these issues/concerns
- Details of outstanding issues and the next steps

3.5.1 RESPONSE

A response is provided / will be provided to all relevant and concerned queries and grievances raised at the periodic meetings. A record of all the grievances received and the mechanism adopted for their redressal is maintained / will be maintained. All written complaints and queries are responded / will be responded to in writing within 30 days of receipt of the letter.

3.6 PERIODICITY OF PUBLIC CONSULTATION

The frequency of public consultations depends on the intensity of the impact. For the more severely affected categories of people, such as the families losing land on account of permanent land acquisition or Right of User acquisition, frequent consultations are held / will be held under the provisions of the applicable legislations and as required by the nodal authority.

For the wider stakeholder group such as media and local NGOs, consultations are held / will be held as and when deemed necessary. Frequency of consultations will be based on the project life cycle stage with greater frequency expected in land acquisition and construction phases of the project as compared to operations phase.

3.6.1 PRE- CONSTRUCTION PHASE

Consultations in the pre-construction / land acquisition /ROU phase are/will be held with the various stakeholder groups on issues related to project details, environmental and social impacts and management plans, land and other natural resources required, socio-economic benefits arising from the project, mitigation measures to minimise any adverse impact, mechanism for consultation and grievance redressal mechanism and health and safety related issues.

3.6.2 CONSTRUCTION STAGE

In the construction phase of the project, meetings will be organised on at least a quarterly basis or as required for effective and timely communication to identify local communities' concerns, any outstanding issues related to land acquisition/ROU, employment opportunities, community development programmes, labour camps, security issues, pressure on local resources like water and fuel wood and construction related impacts and mitigation.

3.6.3 OPERATION PHASE

The meetings for stakeholder consultations in the operation phase may be initially organised once a quarter and later as and when required. These meetings will review progress made in community development initiatives and operations-related issues like waste disposal, traffic, employment opportunities, grievance redressal etc.

The Project Proponents will maintain a regular process of dialogue and information sharing at least once every quarter with government officials, district administration, regulatory authorities and other key stakeholders.

3.6.4 CLOSURE PHASE

Consultation will take place well before closure with relevant stakeholders to address issues and impacts of closure (e.g. retrenchment and re-skilling programmes, rehabilitation of project sites, appropriate use of any suitable remaining infrastructure, disposal of remaining assets etc)

3.7 TASKS FOR AN EFFECTIVE PUBLIC CONSULTATION AND DISCLOSURE PROGRAMME

A step-by-step task list (generic) is provided to guide effective implementation of the Public Consultation and Disclosure Programme.

3.7.1 PREPARATION OF A PROJECT INFORMATION SUMMARY

A Project Summary Information including the main elements of the project, its sponsors, costs, location, description of the project, brief summary of environmental and social impacts (based on detailed studies) and the proposed mitigation measures, estimated land requirements and the acquisition process/ ROU process to be followed will be prepared by the Project Proponents. This would typically consist of English and Hindi translation of the Executive Summary of the Environmental and Social Impact Assessment Report and summary of Project Specific Information.

3.7.2 PREPARATION OF ALTERNATE MEDIA FOR INFORMATION DISSEMINATION

In addition to providing information through public announcements and written documents, alternate media, preferably radio, traditional folk methods such as street plays, puppet shows etc. are effective communication medium with greater outreach and impact of the communication process on the target stakeholders. These methods provide a way of interacting with the community on a regular basis and are an effective means to remove misconceptions, popularise and create awareness about community development programmes, relay public interest messages and generate awareness on health and safety risks.

3.7.3 PRELIMINARY INFORMATION DISSEMINATION ON THE PROJECT

Information is provided to all key stakeholders regarding the project design, environmental and social impacts and proposed mitigation measures. The required information is shared with financial institutions, government officials, regulatory authorities and the district administration. The Environmental and Social Impact Assessment report and the Project Specific Information summary is/will be placed at designated and approved places and consultations held with the key stakeholders including the local community at large to elicit their views and incorporate them in the planning process and the final project designs.

3.7.4 INITIATE A DIALOGUE WITH THE VILLAGE PANCHAYAT

Consultative dialogue with the concerned village panchayats, community leaders and opinion makers ensures local support for project activities. The village panchayats are

the most reliable ground level insights into the village and local communities and also advice on the most effective communication and disclosure strategy / steps keeping in mind the cultural sensitivities of the impact area. The dialogue with the village panchayats is/will be an on-going process and seeks their active participation in development and implementation of specific village level programmes under community development initiatives.

3.7.5 CONSULTATIONS WITH THE LOCAL COMMUNITY

The consultations with the community, both in a formal and informal manner, form the basis for building relationship and understanding with the community at large. These consultations provide valuable information regarding the community's concerns and means of integrating them in the rehabilitation action plan as well as community development programmes. It also provides an opportunity to the Rajasthan JV to identify the development needs that can be addressed by the project.

3.7.6 PROVIDING INFORMATION REGARDING LAND ACQUISITION/ROU AND OTHER RELATED ISSUES

The Land Acquisition/ROU process requires notifications regarding acquisition/ROU to be publicly disclosed. At every stage of the land acquisition/ROU process, there is provisions for adequate flow of communication by virtue of publication of various notifications, declarations, notices etc in the Government Gazette, local press, local areas etc. This ensures provision of timely and reasonable opportunity to all the interested persons to claim rights and compensation.

The Land Acquisition Act, 1894 requires notification for land acquisition to be issued under Section 4(1) indicating the intention of the Government to acquire land or other property in official gazettes and also by publication in two local newspapers, of which at least one should be in a regional language. In addition to the public notice, the substance of such notification has to be made available at convenient places in the locality where the land is situated. The Land Acquisition Officer, under the provisions of the Act is entrusted with the responsibility for providing specific information to the project affected families, especially those who are losing their land, access, assets and / or livelihoods. Information will be related to the process of land acquisition, the exact amount of land to be acquired from each household with, wherever possible, dimensions marked on the ground, the procedures to be followed to claim compensation, the designated people to contact in order to claim the compensation and the necessary steps to be taken to lodge complaints and grievances.

The proposed Barmer - Salaya pipeline would require the acquisition of 'Right of User' for laying pipelines across private and public lands or any other utilities under the provisions of the Petroleum and Minerals Pipelines Act, 1962. The Act specifies all the formalities that a project proponent has to adhere to with respect to publication of notification of acquisition, power to enter and survey the proposed land, hearing of any objections, declaration of acquisition of right of user, restrictions regarding land use and compensation.

The key tenets of the Petroleum and Minerals Pipelines Act, 1962 of concern for purposes of public consultation and disclosure are establishment of a Competent Authority to preside over matters of land, ROU, compensation, hearing objections and dispute settlement and prior notification declaring the intention of acquiring right of user must be obtained from the Competent Authority before entering, surveying or inspecting land/ROU.

3.7.7 INFORMATION AND CONSULTATION ON COMMUNITY DEVELOPMENT AND REHABILITATION ASSISTANCE

The Project Proponents provide/ will provide relevant information to the project-affected families regarding rehabilitation (if any) assistance and income generation schemes, community development programmes that are/could be implemented to restore/improve economic conditions and livelihoods of the people. All these activities are/ will then be incorporated in the community development programmes for implementation in the project-impact area for the benefit of such families. Periodic consultations are/ will be held to obtain feedback from the people regarding the effectiveness of the community development and livelihood restoration programmes, the problems faced or grievances, if any, and other emerging issues.

Separate and exclusive consultations are/ will be held with women and other vulnerable and marginalised sections of the society in focused groups to discuss specific problems resulting from loss of land and income and the subsequent rehabilitation. These discussions are/ will be organised through the assistance of the prominent and credible local NGOs working in the area. This helps the Project Proponents to identify and address the issues specific of such vulnerable groups. Specific common community development programmes for infrastructure improvement / income generation / livelihood restoration are/ will be undertaken, wherever feasible and in due consideration to the cultural sensitivities of the area.

3.7.8 INFORMATION AND CONSULTATION ON GRIEVANCE REDRESSAL AND DISPUTE SETTLEMENT MECHANISM

An independent Grievance Redressal and Dispute Settlement mechanism is/ will be set up that has / will have the responsibility to resolve ordinary and quasi judicial conflicts concerning the project. The Grievance Redressal mechanism is/will be governed by the rules / provisions of the applicable regulatory framework (Land Acquisition Act and / or the Petroleum and Minerals Pipelines Act) and international best practices namely the IFC Performance Standards for Social and Environmental Sustainability including the means for judicial appeal. In consultation with the said authorities, appropriate Grievance Redressal mechanism is/ will be implemented. A generic description of the Grievance Redressal mechanism that may be followed is provided in Section 4.

TABLE 3.1: ACTION-PLAN FOR PUBLIC CONSULTATION AND DISCLOSURE

	KEY ACTION POINTS	TARGET	DISSEMINATION METHODS	BY WHOM	FEEDBACK MECHANISM
1	Disseminate provisions of the Land Acquisition Act and / or the Petroleum and Minerals Pipelines Act in local language	Project-affected families, local community, village Panchayat, District Administration	As per the legal provision under the Land Acquisition Act and / or the Petroleum and Minerals Pipelines Act as applicable	Land Acquisition Officer / Competent Authority	Approach Land Acquisition Officer / Competent Authority, Grievance Redressal Mechanism
2.	Identify and inform affected families about land acquisition / Right of User acquisition and compensation processes	Project-affected families, local community, village Panchayat, District Administration	As per the legal provision under the Land Acquisition Act and / or the Petroleum and Minerals Pipelines Act as applicable	Land Acquisition Officer / Competent Authority	Approach Land Acquisition Officer / Competent Authority, Grievance Redressal Mechanism
3.	Consult village officials / communities / local communities for survey, potential impacts of the project	Project-affected families / Local Communities / Local NGOs / village community representatives / District Administration	Meetings (formal and informal forums) and Focus Group Discussions	CSR and Land Acquisition teams - corporate and site, Rajasthan JV	Meetings, registers at Rajasthan JV local office / notified locations / district administration
4	Disseminate information about the project, the findings of the Environmental and Social Impact Assessment and mitigation measures	Project-affected families / Local Communities / Local NGOs / village community representatives / District Administration	Public Hearings / Presentations, briefing summary, radio programmes, notices at prominent places in local language	CSR, Environment and Land Acquisition teams - corporate and site, Rajasthan JV, Local Administration	Register for feedback placed at the District Collectorate/ Tehsil office / Consultation meetings
5	Disseminate information on Land Acquisition/ROU compensation process, place and schedule of payment	Project-affected families, local community, village Panchayat, District Administration	Written notices/leaflets/public announcements and meetings	Land Acquisition Officer / Competent Authority	Approach Land Acquisition Officer / Competent Authority, Grievance Redressal Mechanism
6	Disseminate information on community development activities, including mitigation measures suggested by the Land Acquisition and	Project-affected families, local communities, partner NGOs, Community representatives, District Administration	Zila Parishad, District Coordination Committee meetings, village committee discussions, community meetings, puppet shows, radio	CSR and Land Acquisition teams, Rajasthan JV	Meetings, registers at Rajasthan JV local office at site, Grievance Redressal Mechanism

	KEY ACTION POINTS	TARGET	DISSEMINATION METHODS	BY WHOM	FEEDBACK MECHANISM
	Compensation Plan		programmes, wall paintings		
7	Disseminate information Grievance Redressal Committee	Project-affected families and local communities, NGOs, Local administration, Zila Parishad, village panchayat	Meetings/letters / DCC meetings / village committee meetings	CSR and Land Acquisition team, Rajasthan JV	Meetings, registers at the Collectorate, Rajasthan JV local office at site

4 IMPLEMENTATION MECHANISM AND MONITORING AND EVALUATION FRAMEWORK

The organisation structure for community development, communications and the land acquisition teams of the Block Operator (Cairn India), both at the corporate as well as at the site / field levels, are/ will be used to implement, manage and monitor the Public Consultation and Disclosure Plan on behalf of Rajasthan JV.

4.1 OPERATOR CORPORATE STRUCTURE

The designated senior management representative of Cairn India oversees/ will oversee the public consultation and disclosure process. This is/ will be supported by a multi-functional team including the community development, land acquisition and the communications teams. The management ensures/will ensure that the community development aspects and the monitoring requirements set out in the Rajasthan Framework Public Consultation and Disclosure Plan are implemented in its intent and spirit.

The Cairn India management through the concerned functional groups coordinates/ will coordinate with other stakeholders on land and community development related matters that have stakes in the project. The specific roles and responsibilities of the concerned functional groups are detailed below.

4.1.1 MANAGER LAND ACQUISITION

The primary role of the Manager Land Acquisition, is to liaise with the Land Acquisition Officer, the District Administration, the Sub-Divisional Magistrate, the Competent Authority and any other regulatory agency and manage the land acquisition process - temporary, permanent and ROU process as applicable. The Manager Land Acquisition works in close consultation with the Head - Legal in all matters related to land lease / permanent acquisition/ ROU and ensures that all laws, policies and regulatory requirements are complied with. S/he is responsible for coordinating with Manager Corporate Social Responsibility (CSR) to ensure that the information relevant for Land Acquisition/ ROU is adequately disclosed to the community periodically.

4.1.2 MANAGER CORPORATE SOCIAL RESPONSIBILITY

The Manager Corporate Social Responsibility (CSR) is responsible to advise on and monitor the implementation of the community development programs and ensuring that free flow of relevant information takes place between the Project Proponents and the local communities and other key stakeholders. S/he work in close coordination with the Manager Land Acquisition in identifying and directing the socio-economic development programs to benefit the community at large in the villages affected by the project-related activities. S/he is responsible for Monitoring and Evaluation (M&E) programmes and report the performance / development indicators to the concerned internal and external stakeholders and make sure that compliance is met with international good practices and policies, as applicable.

The Manager CSR coordinates and liaises with the District Administration and local regulatory authorities to ensure that information to be shared / disclosed with the relevant stakeholders such as executive summary of the Environmental and Social Impact Assessment reports, summary of Project Specific Information and other documents is available at designated places in a culturally appropriate manner of the project impact area.

4.1.3 MANAGER COMMUNICATIONS

The Manager Communications is responsible for assisting in designing communications related to the project on behalf of the company. S/he provides support for developing material in local languages, as is/ will be understood by all stakeholders. S/he provides the necessary liaison with the media, both print and electronic, and is responsible for responding to all queries from this stakeholder group.

Manager Communications is also responsible for updating all company information material, as necessary, with appropriate and timely updates. This includes print and online material.

4.1.4 FIELD TEAM

The operator maintains/will maintain a competent cross-functional Field Team to manage the public consultation and disclosure plan in an efficient and effective manner. The Field team has/ will have the following responsibilities (and indicative list) as detailed below.

- Effective management and monitoring of the Grievance redressal mechanism including providing timely feedback to all stakeholders
- Manage identification, implementation and monitoring of the Rajasthan JV common community development programmes in consultation with the district administration, NGO partners, village committees and local communities
- Work closely with NGO partners and other local developmental organisations in developing, implementing and monitoring rehabilitation and/or developmental programmes
- Be responsible for regular monitoring and reporting of the progress of the Land Acquisition/ ROU and Compensation Plan and maintaining all land-records, permits and approvals, data of project-affected families and impacts of the community development programmes and sharing relevant and appropriate information with the key stakeholder groups at periodic intervals
- Assist in providing information to the Rajasthan JV and Cairn India corporate cross-functional teams of the land acquisition, compensation and rehabilitation programs with particular emphasis on socio-economic impacts to the project-affected households
- Engaging with the local media to disseminate project information and updates

4.2 GRIEVANCE REDRESSAL AND DISPUTE RESOLUTION MECHANISM

The Grievance Redressal and Dispute Resolution mechanism is/ will be governed by the rules / provisions of the applicable Acts (Land Acquisition Act / Petroleum and Minerals Pipelines Act) including the means for judicial appeal in alignment with the requirements of international best practices such as the IFC Performance Standards on Social and Environmental Sustainability.

In general, the District Administration or the relevant nominated authority / Competent Authority, in consultation with the Rajasthan JV, nominates/ will nominate a Grievance / Dispute Redressal Committee (GRC). The committee has/ will have representation of key stakeholder groups and reports/will report to the District Collector or his or her nominee / designated personnel from the Competent Authority on all matters related to community grievance / complaints arising out of the Rajasthan JV projects or operations.

The Grievance Redressal Procedure is/will be designed to address the following specific objectives:

- To facilitate timely feedback from local communities about Rajasthan JV and Contractor/Subcontractor performance in order to support Rajasthan JV commitment
- To ensure effective and timely resolution of grievances thereby reducing the risk of escalation of conflicts and avoiding unnecessary costs
- To ensure careful documentation of grievances and remedial actions to enhance accountability and to reduce liability

The Grievance Redressal procedure, in general, has the following six steps:

- **Step 1 - Receive Grievance:** Grievances provided to the GRC through any of the nominated GRC member in writing. The grievance is recorded in the Grievance Register maintained at the District Collectorate / office of the Competent Authority
- **Step 2 - Preliminary Assessment:** The GRC team assesses/will assess the grievance to identify the underlying cause(s) and to rate the severity of the grievance accordingly. An internal investigation into the cause(s) of the grievance is/ will be undertaken wherever deemed necessary
- **Step 3 - Acknowledge Grievance:** Within 15 working days of receipt of the grievance, the GRC sends/ will send a letter to the Complainant to acknowledge the grievance. The letter provides/ will provide information on proposed date of GRC meeting in which the issue would be discussed. The letter gives/ will also give the contact detail of the GRC members who can provide information on the progress of resolution of the grievance
- **Step 4 - Investigate and Resolve:** The GRC, wherever necessary, investigates/ will investigate the underlying cause(s) of the grievance and to action any changes required to internal systems to prevent recurrence of a similar grievance. In parallel and wherever necessary, the GRC holds/ shall hold meetings or other appropriate communications with the complainant, with the aim of reducing any resultant tensions
- **Step 5 - Close-out:** Once the investigation has been completed, the results are/ will be communicated to the Complainant. The GRC will seek to confirm that its actions have satisfied the Complainant and if deemed necessary by the GRC, the complainant would be requested to sign a Statement of Satisfaction
- **Step 6 - Follow-up:** The GRC with the assistance of the Manager Community Development (Field) will investigate the root causes of major or symptomatic grievances wherever deemed necessary to ensure that the similar grievances do not recur

4.3 MONITORING AND EVALUATION

Provision are/ will be made for regular monitoring and evaluation of the public consultation process and 'lessons learned' are/ will be taken into account to improve performance. The Rajasthan JV - Gujarat Framework Public Consultation and Disclosure Plan is a 'living document' which is updated periodically (every one to two years) to record consultation undertaken, issues raised and actions taken to describe

any changes to the consultation process and to outline the schedule for on-going interactions.

The Rajasthan JV - Gujarat Framework PCDP proposes both internal and external monitoring. The internal monitoring processes include monitoring by the Field Team as well as the overall monitoring by the corporate cross-functional teams. The external monitoring, annually or if any when required, will be undertaken by an independent third party, supported by the JV team. The framework ensures coordination between all three tiers of the monitoring process. This framework is designed to tie up with the over all organisational and implementation arrangements of the Rajasthan JV - Gujarat Framework PCDP.

4.3.1 INTERNAL MONITORING ACTIVITIES

Internal monitoring focuses on measuring and reporting on progress with implementing the PCDP activities for the project activities in the RJ-ON-90/1 block, and the Barmer - Salaya Pipeline and may include the following activities:

- Liaison with the relevant departments like Operations, the Corporate Communications, Legal, Land Acquisition group, Construction contractor and local communities to review and report on progress with respect to information dissemination on land acquisition, compensation and resettlement
- Verification through interviews with a cross section of project affected households and the community that land and compensation entitlements are being delivered in accordance with the Land Acquisition and Compensation Plans commitments
- Verification that measures for rehabilitation assistance and community development programmes are being implemented with benefits reaching out to the communities in the project impact area
- Identification of any problems, especially problems facing any vulnerable households, unresolved issues from project-related activities
- Review grievance records and check that grievance logs are being correctly completed and maintained
- Selection of a random sample of grievances and follow up with the complainants that appropriate corrective actions have been taken and that outcomes are satisfactory
- Review reports on incidents connected with project-related activities, land acquisition, compensation and resettlement issues and follow up with the complainants that appropriate corrective actions have been taken and that outcomes are satisfactory
- Preparation of brief quarterly progress and compliance reports for JV, and other external stakeholders on the grievance redressal, public consultation and progress update on the community development programmes

4.3.2 EXTERNAL MONITORING ACTIVITIES

Rajasthan JV will engage an independent external organisation to undertake audits of Project related PCDP activities, as and when required. The purpose of the external

monitoring audit is to assess overall compliance with the Gujarat Framework Public Consultation and Disclosure Plan and in alignment with the international good practices like the IFC Performance Standards.

Activities to be undertaken as part of external monitoring include the following:

- Review of the internal monitoring procedures, reporting, and grievance recording to check these activities are being adequately performed
- Review of internal monitoring records and progress reports as a basis for identifying any areas of non-compliance
- Review of grievance logs (JV and Contractors') and assessment of the Grievance Redressal Mechanism and suggestions for any areas of improvement
- Meet with a cross-section of local government officers, community leaders and representatives, Project affected people and vulnerable households to assess the implementation of the process and procedures stated in the Gujarat Framework Land Acquisition and Compensation Plan, including consultation activities, information dissemination grievance management, benefits of the community development programmes
- Prepare a report for the Rajasthan JV Management on project compliance with the consultations and disclosure commitments, identifying gap areas and recommending any necessary corrective actions and identifying areas of residual social risk

REFERENCES

- Cairn India Group HSE Management System - Procedure D2 - Guidelines for Stakeholder Management
- Cairn India Group Corporate Project Consultation and Disclosure Plan, February 2008
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